

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 4/28/2020
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MEMORANDUM ENDORSED

Michael Grunfeld
Partner

VIA ECF

April 28, 2020

The Honorable Gregory H. Wood
 United States District Court
 Southern District of New York
 Daniel Patrick Moynihan
 United States Courthouse
 500 Pearl Street, Room 2260
 New York, NY 10007

RE: *Bellingham v. Qudian Inc., et al.*, No. 1:20-cv-00577-GHW

Dear Judge Woods:

We represent Co-Lead Plaintiffs Juan Pablo di Benedetto and Galessi Holding Corp (collectively, “di Benedetto”) and Pablo Greco (“Lead Plaintiffs”), in the above captioned securities class action. Pursuant to Rule 1.F of your Honor’s Individual Rules of Practice, Lead Plaintiffs submit this letter on behalf of all parties requesting that the Court so-order the stipulation and proposed scheduling order, filed concurrently herewith, for Lead Plaintiffs’ filing of an amended complaint and Defendant’s anticipated motion to dismiss.¹

The proposed schedule provides the following deadlines:

Event	Date
Amended Complaint	June 12, 2020
Defendants’ pre-motion letter in connection with motion to dismiss	July 10, 2020
Lead Plaintiffs’ response to pre-motion letter	July 17, 2020
Motion to dismiss	August 12, 2020 or 14 days after the Court’s ruling on pre-motion letter (whichever is later)
Opposition to motion to dismiss	42 days after filing of motion to dismiss
Reply brief in support of motion to dismiss	28 days after filing of opposition

¹ We have asked counsel for Qudian Inc. whether they are able to accept service on behalf of the Individual Defendants, Min Luo and Carl Yeung, and are continuing to discuss that possibility.

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The parties further propose that because this is a putative federal securities class action governed by the provisions of the Private Securities Litigation Reform Act (the “PSLRA”), 15 U.S.C. §§ 78u-4, the joint status letter, proposed case management plan, and initial pre-trial conference that are currently scheduled for June 11, 2020 and June 18, 2020, be adjourned pending the Court’s decision on Defendant’s anticipated motion to dismiss.

Should the Court have any questions or concerns, counsel for both parties are available upon the Court’s request.

Respectfully submitted,

/s/ Kim E. Miller

Kim E. Miller

KAHN SWICK & FOTI, LLC

250 Park Avenue, Suite 2040

New York, NY 10177

Telephone: (212) 696-3730

Facsimile: (504) 455-1498

Email: kim.miller@ksfcounsel.com

/s/ Michael Grunfeld

Michael Grunfeld

POMERANTZ LLP

600 Third Avenue, 20th Floor

New York, NY 10016

Telephone: (212) 661-1100

Facsimile: (212) 661-8665

Email: mgrunfeld@pomlaw.com

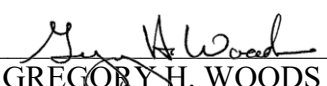
*Co-Lead Counsel for Co-Lead Plaintiff Juan
Pablo di Benedetto and Galessi Holding Corp*

*Co-Lead Counsel for Co-Lead Plaintiff Juan
Pablo di Benedetto and Galessi Holding Corp*

Application granted in part and denied in part. The deadline for Plaintiffs to file an amended complaint is June 12, 2020. The Court will hold a telephone conference regarding Defendants’ anticipated motion to dismiss on July 17, 2020 at 4 p.m. The deadline for Defendants to submit their pre-motion conference letter is July 8, 2020; Plaintiff’s response is due no later than July 15, 2020. The Court expects to set a briefing schedule for the motion to dismiss during the pre-motion conference. The initial pre-trial conference scheduled for June 18, 2020 is adjourned *sine die*.

SO ORDERED.

Dated: April 28, 2020


GREGORY H. WOODS
United States District Judge